

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

Landmark Television of Tennessee, Inc. ("Landmark"), licensee of WTVF-TV, Nashville, Tennessee, in accordance with the Commission's Order (DA-1377) of July 2, 1997, hereby supplements its June 13, 1997 Petition for Reconsideration of the Commission's Sixth Report and Order ("Sixth R&O"), FCC 97-115, released April 21, 1997, 62 Fed. Reg. 26684 (May 14, 1997), in the above-captioned proceeding. For the reasons set forth below, Landmark hereby withdraws its request for an alternative DTV channel assignment, but requests that the Commission retain Channels 2-6 within the "core spectrum" for digital operations so that, after the transition period, WTVF-TV will be able to relocate its DTV operations to the station's current NTSC channel.

As Landmark stated in its Petition for Reconsideration, WTVF-TV currently operates on NTSC Channel 5. In the DTV Table of Allotments contained in Appendix B to the Sixth R&O, the Commission allotted DTV Channel 56 to WTVF-TV. In its Petition, however, Landmark noted the apparent availability of Channel 12 as an alternative to Channel 56 for DTV use by

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WTVF-TV. Use of Channel 12 would have permitted Landmark to avoid the necessity of a later relocation of its digital operations and the associated business planning uncertainties inherent in the use of DTV Channel 56, which is outside the “core spectrum” for digital operations after the transition period.¹

Unfortunately, further review of the proposed use of Channel 12 by Landmark’s engineering consultants in light of the technical standards set forth in Office of Engineering and Technology Bulletin No. 69 revealed significant interference problems which render the use of Channel 12 impracticable. Accordingly, Landmark hereby withdraws its request for the alternative allotment of DTV Channel 12, and advises the Commission that WTVF-TV intends to implement DTV operations on Channel 56, as specified by the Commission.

In this connection, however, Landmark notes that, at the end of the transition period, WTVF-TV plans to return to its currently assigned NTSC channel, Channel 5, for permanent DTV operations. Accordingly, Landmark urges the Commission to retain Channels 2 through 6 as part of the “core spectrum” for digital broadcasting. As demonstrated in the “Petition for Reconsideration of Decision Regarding Channels 2-6” filed on May 29, 1997 on behalf of Certain Channel 2-6 Licensees (“Licensees”), there is no field data or other engineering support for singling out Channels 2-6 for “wait and see” status regarding their future use. Indeed, rather than presenting difficulties for DTV transmission, these channels may have the potential for extended coverage in rural areas and over rugged terrain, given their recognized broad-range propagation characteristics and spectrum efficiency. Thus, there is no reason to treat Channels 2-

¹ The Commission has stated that it intends to locate all DTV channels within a “core spectrum” of either channels 2-46 or 7-51. See Sixth R&O at ¶ 83.

6 differently than any other channels. There is, however, a good reason not to stigmatize Channels 2-6 by questioning their viability: the uncertainty created by placing these channels in a twilight zone makes business planning for the DTV era problematic. If DTV does not proceed on the low-band channels, stations such as WTVF-TV may have to construct a second set of facilities and operate on less suitable channels after the transition period. The difficult decisions of where and when best to invest the large sums of money involved in equipping a DTV station thus will be made even more difficult, to the inevitable detriment of the viewing public.

Accordingly, Landmark urges the Commission to confirm at the earliest possible juncture that Channels 2-6 will be included among the core channels for permanent DTV operations.

Respectfully submitted,

**LANDMARK TELEVISION
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August 22, 1997

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